

WALIA & WALIA, PLLC

Attorneys at Law

136-40 39th Avenue, Suite #304

Flushing, New York 11354

Phone 718-353-4478

Fax 718-353-4578

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VIA E-MAIL

akadochnikov@sbagk.com

SHIRYAK, BOWMAN, ANDERSON, GILL
& KADOCHNIKOV, LLP

RE: Patel v. Singh
Index No.: 2:21-cv-00759-JS-SIL

Interrogatory responses for both Noddy and Arjun Singh respectively

1.State your full name and any other names or aliases that you have used in the past for any reason, as well as your home and business address, driver's license number, and marital status.

Noddy Singh, a.k.a Royal Singh 5 Mineola Avenue Hicksville, New York 11801. Rest is objected to as irrelevant and objectionable means to identify the plaintiff.

Arjun Singh, 48 Genesse street Hicksville, New York 11801. Rest is objected to as irrelevant and objectionable means to identify the plaintiff.

2.Identify each and every person who has, claim to have, or whom you believe have knowledge of any relevant facts relating to the above-entitled action.

Named parties and a person named Verma who is plaintiffs' friend.

3.Identify the specific business relationship and/or employment relationship between you and Arjun Singh. Attach any and all documents that evidence the same.

Director, shareholder and employee of Pan King, Inc.

4.Identify the specific business relationship and/or employment relationship between you and Pan King, Inc. Attach any and all documents that evidence the same.

Director, shareholder and employee of Pan King, Inc.

5.Identify all communication, verbal or written, between You and either Plaintiff related to the formation of the partnership concerning Pan King, Inc. Attach any and all documents that evidence the same.

Communication was in November and December of 2016 we were approached by plaintiffs to possibly start some sort of food venture.

6. Identify what Plaintiffs' initial investment of \$50,000 was used for in relation to Pan King, Inc. Attach any and all documents that evidence the same.

Applied toward purchase of existing restaurant Grill Junction from TJNY Enterprise Inc.

7. Identify what profits, if any, Pan King, Inc. made from November 2017 to Present. Attach any and all documents that evidence the same.

Cash profit taken by Pratik Patel June 2018- \$600, July 2018-\$600, August 2018-\$600 plus salary and tip which Pratik Patel took as cash.

8. Identify the responsibilities you have in the management of Pan King, Inc.

Branding, choosing location, researching location, brand concept, construction of location, putting forth menu, sourcing menu, creating recipes, business vendor contacts, hiring staff, training staff, running and managing day to day operations including purchasing of goods, and repair and maintenance of equipment.

9. Identify the person who prepared Pan King Inc's taxes.

Harvinder Dhody

10. Identify all bank accounts for You and Pan King Inc.

Bank of America

11. Identify all credit card processing software and hardware used by You or by Pan King Inc

Cloves Pos Bank of America

12. Identify how the responsibilities are split between You and Arjun Singh in the management of the business affairs of Pan King, Inc.

We would cover each other shifts, bring supplies, maintain and repair equipment on an alternate schedule as needed.

13. Identify how the topic of discussion came about in reference to the formation of the partnership with Pratik Patel. Specifically, answer the following: a. Did you approach Pratik Patel about forming a partnership?

Formation of a partnership was not discussed. We were approached by Plaintiffs to start a joint venture.

If yes, why did you approach him?

We never approached him 1st.

b. What was the conversation between You and Pratik Patel which lead to Pratik Patel accepting your proposal? Attach any and all documents that evidence the same.

Lalit Patel approached us at our prior restaurant Deli 6 with a person named "Verma" when he was a customer, they wanted to start a joint food venture. We decided to form Pan King, Inc. with Lalit Patel and Pratik Patel. Pratik Patel agreed to work 48 hours per week at Pan King, Inc. but abruptly left when the business started taking a loss. See attached texts.

14. Identify why Plaintiffs were denied access to Pan King Inc.'s corporate books and records. Attach any and all documents that evidence the same.

Never denied access, Pratik Patel is listed as the "signer" on the bank account, annexed hereto.

15. State the names and addresses of any and all expert witnesses whose testimony You intend to rely on at trial.

None to date.

16. State the names and addresses of any and all lay witnesses whose testimony You intend to rely on at trial.

Verma a friend of the plaintiffs.

PLEASE TAKE FURTHER NOTICE, that Defendants reserve the right to amend these responses during the course of litigation.

By: BOBBY WALIA

Bobby Walia, Esq.

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